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September 7, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: MM Docket No. 94-71
File No. BPED-920305ME

Dear Mr. Caton:

Transmitted herewith on behalf of California State University, Long Beach Foundation, licensee of noncommercial educational FM broadcast station KLON, Long Beach, California, which operates on Channel 201 and has an application pending that is mutually exclusive with the recently amended application of Santa Monica Community College District (File No. BPED-920305ME), are an original and six (6) copies of its Petition for Leave to Intervene, submitted pursuant to Section 1.223 of the Commission's Rules.

Should any question arise concerning this matter, please communicate with this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH

Patricia A. Mahoney
Counsel for California State
University, Long Beach Foundation

PAM/dlr
Enclosure
cc: The Honorable Joseph Stirmer (w/enc.) (by hand delivery)
Gary Schonman, Esquire (w/enc.) (by hand delivery)
Gary Curtis, Esq. (w/enc.)
Lewis J. Paper, Esq. (w/enc.)

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SEP 17 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re Applications of	)	
	)	MM Docket No. 94-71
SANTA MONICA COMMUNITY COLLEGE DISTRICT (hereafter "SMCCD")	)	File No. BPED-920305ME
	)	
For Construction Permit for a New Noncommercial FM Station on Channel 204B in Mojave, California	)	
	)	
LIVING WAY MINISTRIES (hereinafter "Living Way")	)	File No. BPED-920511MC
	)	
For Construction Permit for a New Noncommercial FM Station on Channel 205A in Lancaster, California	)	

DOCKET FILE COPY ORIGINAL

Directed to: The Honorable Joseph Stirmer
Chief Administrative Law Judge

PETITION FOR LEAVE TO INTERVENE

California State University, Long Beach Foundation ("CSU"), licensee of noncommercial educational FM station KLON(FM), Long Beach, California, by its attorneys, and pursuant to Section 1.223 of the Commission's rules, hereby respectfully seeks leave to intervene in the above-captioned proceeding. In support whereof, the following is submitted:

The Commission set the above-captioned mutually exclusive applications for hearing by Hearing Designation Order, FCC 94M-453, released June 27, 1994 ("HDO"). On July 1, 1994, the applicant parties filed a Joint Petition for Approval of Settlement Agreement ("Joint Petition"), in which they proposed to resolve their mutual exclusivity **by SMCCD amending its**

application to specify operation on channel 201--three channels removed from its then pending proposal.

On July 5, 1994, SMCCD filed a Petition for Leave to Amend and **a major change amendment specifying operation on channel 201.** To the best of CSU's knowledge, the SMCCD major amendment has not yet appeared on the Commission's FAIR Report or on any public notice or other list of pending applications and/or amendments that has been made available to the public.

After SMCCD's amendment and Petition for Leave to Amend were tendered but before the Mass Media Bureau submitted its comments on the petition and amendment and **before the presiding judge accepted the CSU major change amendment,**[1] CSU, on July 13, 1994, filed a minor change application to upgrade the licensed facilities of KLON, which operates on Channel 201, at Long Beach, California. At the time CSU filed its application, CSU was totally unaware, and had no reason to know, that SMCCD had filed a **major change amendment** to its pending application to specify operation on channel 201.

A summary of the HDO in this proceeding was published in the Federal Register on July 19, 1994. Also on July 19, 1994, the

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[1]Chief Administrative Law Judge Joseph Stirmer granted the Joint Petition for Approval of Settlement Agreement and the Petition for Leave to Amend by Memorandum Opinion and Order, FCC 94M-453, released July 25, 1994. In that order, the ALJ noted that SMCCD's application was "grantable" but withheld action on the application pending receipt of an FAA "no hazard" determination for the amended proposal. On July 25, 1994, however, the SMCCD application was not grantable. CSU's minor modification application was on file and had appeared on a Public Notice.

KLON minor modification application (FCC File No. BPED-940713IZ) appeared on Public Notice, Report No. 15856.

On August 22, 1994, more than 30 days after publication of the HDO in the Federal Register, SMCCD filed an "Informal Objection of Santa Monica Community College District" ("Informal Objection") directed against CSU's application. As a result of this filing, CSU learned for the first time that SMCCD had proposed, **in a major change amendment mutually exclusive with CSU's application**, to operate on channel 201.

It does not appear to CSU that SMCCD has filed any amendment or report in this proceeding to advise the presiding judge of the mutual exclusivity of its pending application, as now amended, with CSU's minor modification application, despite the fact that SMCCD acknowledges in its Informal Objection and the technical showing attached thereto that CSU's minor modification application is mutually exclusive with SMCCD's application as amended by its **major change amendment to specify operation on channel 201.** In fact, SMCCD filed a Petition for Leave to Amend its application on September 1, 1994, after it filed its Informal Objection acknowledging the mutual exclusivity with CSU's application; but SMCCD's September 1 Petition does not advise the presiding judge of the pendency of **CSU's mutually exclusive application** and seeks grant of the SMCCD application as if all impediments to a grant had been resolved.

Although the Informal Objection correctly recognizes that SMCCD's amended proposal and CSU's minor modification application

are mutually exclusive, the Informal Objection is incorrect and misleading when it asserts that CSU's application is precluded by operation of the Commission's cut-off rules. The SMCCD application that appeared on a cut off list two years ago specified operation on channel 204. CSU's minor modification application filed on July 13, 1994, was not and is not mutually exclusive with the SMCCD application that appeared on a cut off list or with the application of Living Way. CSU's July 13, 1994 application would have been perfectly acceptable for filing any time after the cut-off date for SMCCD's application had passed. The mutual exclusivity that now exists is between **SMCCD's application, as modified by its major change amendment, that has not appeared on any cut-off list,** and CSU's minor modification application. SMCCD's application as now amended cannot be granted absent a hearing in which CSU's modification application and SMCCD's application, as modified, are compared.

Thus, as the foregoing demonstrates, CSU's pending modification application is mutually exclusive with SMCCD's application as now amended. CSU's application was acceptable when filed. CSU was unaware of and had no way of knowing about the recent SMCCD post designation **major change amendment** affecting CSU's application until after the 30 day period for filing petitions for leave to intervene under Section 1.223(b) had passed.[2] SMCCD's filing against CSU's application

---

[2]Neither the HDO as released nor its publication in the Federal Register provided any notice to CSU that SMCCD would

acknowledges the mutual exclusivity between the two applications; thus the requirements of Section 1.223(c) are met by SMCCD's own filings with the Commission, official notice of which is requested. Accordingly, CSU should be granted leave to intervene in this proceeding.

Wherefore, for the foregoing reasons, California State University, Long Beach Foundation, respectfully requests leave to intervene in the above-captioned proceeding and requests that the issues in this hearing be modified or that SMCCD's application be returned to the processing line for consideration and eventual hearing between CSU's pending upgrade proposal and the mutually exclusive application of Santa Monica Community College District, as modified by its July 5, 1994 **major change amendment**.

Respectfully submitted,

CALIFORNIA STATE UNIVERSITY,
LONG BEACH FOUNDATION

By: Patricia A. Mahoney
Patricia A. Mahoney
Kathleen Victory

Its Attorneys

FLETCHER, HEALD & HILDRETH
1300 North 17th Street
11th Floor
Rosslyn, Virginia 22209
(703) 812-0400

September 7, 1994

---

amend its proposal by changing its operations to a channel three channels removed from the application as designated for hearing.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In Re Application of:	)	
	)	
California State University,	)	
Long Beach Foundation	)	FCC File No.
Application for Construction Permit	)	BPED-940713IZ
for Noncommercial Educational Broadcast	)	
Station KLON, Long Beach, California	)	

To: Chief, Mass Media Bureau

INFORMAL OBJECTION OF SANTA MONICA COMMUNITY COLLEGE DISTRICT

Santa Monica Community College District ("SMCCD"), by counsel, and pursuant to Section 73.3587(a) of the Commission's Rules, 47 C.F.R. 73.3587(a), hereby files this informal objection to the application of California State University, Long Beach Foundation for an increase in affected radiated power for NCE-FM station KLON, Long Beach, California, and states as follows:[1]

1. On March 5, 1992, SMCCD filed an application with the Federal Communications Commission ("FCC") for a new noncommercial FM station on Channel 204B in Mojave, California (File No. BPED-920305ME). By Public Notice released on April 6, 1992, the Commission accepted SMCCD's application for filing and established a cut-off date of May 11, 1992 (Report No. A-235).

---

[1] Since California State University classifies its application as a minor modification, SMCCD has filed an Informal Objection, rather than a formal Petition to Deny. To the extent the Commission treats California State University's application as an application for major modification, SMCCD requests that this pleading be treated as a Petition to Deny. To that end, SMCCD notes that this pleading has been filed within 30 days of the date that California State University's application was accepted for filing, in conformance with Rule 73.3584(a) regarding petitions to deny.

2. Living Way Ministries ("LWM") filed an application with the FCC for a new noncommercial FM station on Channel 205A in Lancaster, California on May 11, 1992, before the cut-off date for SMCCD's application.

3. SMCCD's application and LWM's application were deemed by FCC rules to be mutually exclusive because of a contour overlap.

4. On June 27, 1994, the FCC issued a Hearing Designation Order requiring a comparative hearing to be held with respect to SMCCD's and LWM's respective applications. (Hearing Designation Order No. 43638, released June 27, 1994.)

5. On June 28, 1994, SMCCD and LWM executed a Settlement Agreement, by which SMCCD agreed to amend its application to change its proposed channel of operation from 204B to 201B. Both parties understood that the FCC's acceptance of the amendment would eliminate the conflict between SMCCD's and LWM's applications.

6. SMCCD and LWM filed a Joint Petition for Approval of Settlement Agreement with the FCC on July 1, 1994, and a Petition for Leave to Amend SMCCD's application on July 5, 1994.

7. On July 14, 1992 the Mass Media Bureau filed Consolidated Comments expressing its approval of the Settlement Agreement and SMCCD's Petition for Leave to Amend its application.

8. By order of July 25, 1994, the Chief Administrative Law Judge (ALJ) of the FCC issued an order granting the Joint Petition for Approval of Settlement Agreement and granting

SMCCD's Petition for Leave to Amend its application. Memorandum Opinion and Order, MM Dkt. No. 94-71, FCC 94M-453 (July 25, 1994) (copy attached). By that order, the Judge granted LWM's application and deemed SMCCD's application "grantable", awaiting only a "no hazard determination by the Federal Aviation Administration, which was expected to be issued imminently.

9. On July 13, 1994 -- two years after the cut-off date on SMCCD's application -- California State University, Long Beach Foundation, filed an application for a construction permit for modification of the facilities for KLON-FM. As described in the attached Engineering Exhibit, prepared by John J. Davis, Consulting Engineer, the KLON proposal will result in damaging interference to the protected coverage area of Santa Monica's proposed Mojave station.

10. Under section 73.3573 of the Commission's rules, mutually exclusive applications must be filed before the cut-off date, which is 30 days after the issuance of a Public Notice listing applications that have been accepted for filing. 47 C.F.R. § 73.3573(e). The cut-off procedure is designed to permit the Commission to cease accepting applications from new parties so that a choice can be made between timely filed applicants. See, e.g., Application of Florida Institute of Technology, Inc., 65 RR2d 1864 (1989); RKO General, Inc., 89 FCC 2d 297, 319-321 (1982).

11. California State University's application conflicts with the application of SMCCD and was filed after the cut-off

date for SMCCD's application. Therefore, California State University's application should be dismissed.

12. The Engineering Exhibit includes an alternate proposal for modification of KLON's facilities that would eliminate the interference overlap to Santa Monica's proposal Mojave station. In the alternative, the Commission should require California State University to amend its application consistent with the alternative proposals.

Respectfully submitted,

By: _____

Lewis J. Paper
Dana J. Lesemann
KECK, MAHIN & CATE
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005-3919
(202) 789-3400
Attorneys for Santa Monica
Community College District

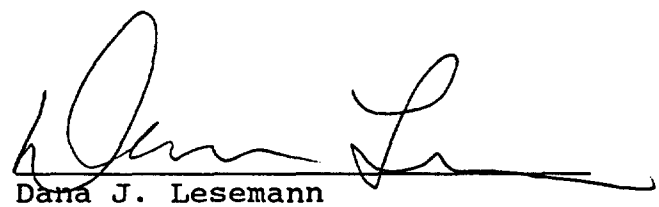
Dated: August 22, 1994

CERTIFICATE OF SERVICE

I hereby certify that on this 22d day of August, 1994, I caused a copy of Santa Monica Community College District's Petition to Deny to be served by first-class United States mail, postage prepaid, on:

Patricia A. Mahoney
Fletcher Heald & Hildreth
Counsel for California State University,
Long Beach Foundation
11th Floor
1300 North 17th Street
Rosslyn, Virginia 22209

Roy J. Stewart, Chief
Mass Media Bureau
Federal Communications Commission
1919 M Street
Room 314
Washington, D.C. 20554
(By Hand)



Dana J. Lesemann

ENGINEERING EXHIBIT

OBJECTIONS TO THE APPLICATION OF CALIFORNIA STATE UNIVERSITY, LONG BEACH FOUNDATION FOR AN INCREASE IN EFFECTIVE RADIATED POWER FOR NCE-FM STATION KLON LONG BEACH, CALIFORNIA

PREPARED FOR:

SANTA MONICA COMMUNITY COLLEGE DISTRICT
1900 PICO BOULEVARD
SANTA MONICA, CALIFORNIA 90405-1628

AUGUST 19, 1994

PREPARED BY:

JOHN J. DAVIS
CONSULTING ENGINEER
POST OFFICE BOX 128
SIERRA MADRE, CALIFORNIA 91025-0128
(818) 355-6909
FAX: (818) 355-4890

1.0 INTRODUCTION

This Engineering Exhibit was prepared for SANTA MONICA COMMUNITY COLLEGE DISTRICT ("Santa Monica"), applicant for a new non-commercial FM (NCE-FM) station operating on Channel 201B to serve Mojave, California, to support its objections to the proposed power increase of co-channel NCE-FM station, KLON in Long Beach, California.

California State University, Long Beach Foundation, licensee of NCE-FM station KLON ("KLON"), has filed an application for construction permit (FCC File No. BPED-940713IZ) to change channel classification from Class B1 to Class B, to increase the effective radiated power ("ERP") and to install a directional antenna. Unfortunately, the KLON proposal will result in damaging interference to the protected coverage area of Santa Monica's proposed Mojave station.

This exhibit will detail the extent of the interference and offer a compromise which will allow KLON to achieve most of their coverage upgrade and yet protect Santa Monica's proposed Mojave station.

2.0 INTERFERENCE CONSIDERATIONS

Table I lists the distances to the proposed station's F(50,50) primary contours and Table II is the distance to the F(50,10) interference contours. Table III-A lists KLON's current licensed operating conditions, Table III-B lists KLON's current proposal and Table III-C is the compromise conditions where KLON would be able to up-grade but will protect Santa Monica's proposed station.

2.1 KLON's Current Operating Conditions:

When the Santa Monica application was prepared, it was prepared with the current KLON operation in mind. The directional antenna characteristics and ERP were selected so that there would be no interference overlap to KLON. This protection to KLON was not without great sacrifice to Santa Monica's coverage area. It can be seen in Table III-A that there is a "safety Zone"[1] of more than 8 kilometers protection to KLON.

2.2 KLON's Proposed Operating Conditions:

KLON in its recent application (FCC File No. BPED-940713IZ), proposes to increase the ERP from 8.0 kW to 30.0 kW in the direction of Santa Monica's proposed new station. Table III-B shows that the proposed KLON 40 dBu F(50,10) interference contour extends 18.7 km beyond the 60 dBu protected contour of Santa Monica's proposed new Mojave station, in violation of Section 73.509.

---

[1] "Safety-zone" being defined as the closest distance that the relevant primary and interference contours come to each other.

This overlap will result in interference to a sizeable area within Santa Monica's protected coverage area. Figure 1 is a portion of State of California, South topographic map, scale 1:500,000, which shows the interference area[2] which would result from the KLON proposal.

	INTERFERENCE AREA	SANTA MONICA 60 DBU CONTOUR	%
AREA:	883 sq. km	5,397 sq. km	16.4
POPULATION:			
1980 Census:	7,449	71,950	10.4
1986 Upgrade:	8,866	83,498	10.6
1992 Census:	12,089	118,174	10.2

The interference area represents 16.4% of the total coverage area and 10.2% of the total population, which represents a significant portion of the total coverage area.

[2] "Interference area" is defined as the area where the desired signal exceeds the undesired signal by 20 dB.

3.0 ALTERNATE PROPOSAL

If KLON would amend its application so that within the 40° arc between 340° and 20° the ERP was reduced to the levels shown in Table III-C, the interference overlap to Santa Monica's proposed Mojave station would be eliminated. Figure 2[3] shows the KLON contours for the current licensed operation and also for the alternate proposal presented here. As it can be seen, the alternate proposal eliminates the interference to either station.

4.0 SUMMARY

The proposal of KLON to increase the ERP by almost 4 times in the direction of Santa Monica's proposed new Mojave station will cause damaging interference within Santa Monica's coverage area. Since both KLON and Santa Monica propose to operate on the same channel, this type of interference is the most damaging. It is requested that the KLON proposal not be granted and serious consideration be given to the alternate proposal presented here.

---

[3] Figure 2 is Figure 5 from Santa Monica's Mojave Channel 201B application.

OBJECTIONS TO APPLICATION OF
NCE-FM STATION KLON
LONG BEACH, CALIFORNIA

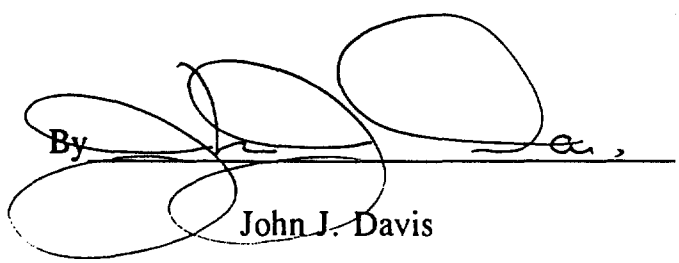
PREPARED FOR:

SANTA MONICA COMMUNITY COLLEGE DISTRICT
SANTA MONICA, CALIFORNIA

5.0 AFFIDAVIT

STATE OF CALIFORNIA)
) ss:
COUNTY OF LOS ANGELES)

JOHN J. DAVIS, does hereby swear that he is a consulting electronics engineer with offices in Sierra Madre, California; that he is a Registered Professional Engineer in the State of California; that his qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission; that the foregoing engineering statement was prepared by him or under his direction; and that the statements contained therein are true of his own knowledge and belief, and as to those statements prepared under his direction, he verily believes them to be true and correct.



August 19, 1994

TABLE I

PROPOSED STATION - PRIMARY CONTOURS

NEW 35° 04′ 02" - 118° 23′ 03"
Mojave, CA
Santa Monica Community College District
Channel 201B, 88.1 MHz
ERP = 22 kW (13.42 dBk)
Antenna Heights: 1,562 Meters AMSL
195 Meters HAAT
26 Meters AGL

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	ERP (dBk)	DISTANCE TO CONTOURS F(50,50) 70 DBU (km)	F(50,50) 60 DBU (km)
0	213	7.55	23.3	39.4
*10	236	9.53	27.1	44.8
*20	243	11.50	30.6	49.3
*30	241	12.93	33.0	52.2
*40	228	13.42	32.9	52.2
45	150	13.42	26.9	44.9
*50	61	13.42	17.6	30.3
*60	145	13.42	26.5	44.2
*70	344	13.42	39.7	60.4
*80	284	13.42	36.4	56.3
90	395	13.42	42.2	63.7
*100	456	13.42	45.1	67.5
*110	498	12.91	46.2	69.2
*120	492	11.41	42.7	65.0
*130	488	9.42	38.6	60.1
135	484	8.41	36.5	57.5
*140	474	7.42	34.2	54.7
*145	472	6.42	32.2	52.4
*150	470	5.42	30.4	50.1
*155	437	4.42	27.6	46.2
*160	404	4.42	26.6	44.5

TABLE I

PROPOSED STATION - PRIMARY CONTOURS

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	ERP (dBk)	DISTANCE TO CONTOURS F(50,50) 70 DBU (km)	DISTANCE TO CONTOURS F(50,50) 60 DBU (km)
*165	356	4.42	25.1	42.2
*170	308	4.42	23.4	39.6
*175	286	4.59	22.8	38.6
180	263	4.95	22.3	37.9
*190	184	5.99	20.0	34.2
*200	94	6.43	14.3	25.6
*210	-3	6.43	8.2	14.5
*220	-23	6.43	8.2	14.5
225	-99	6.43	8.2	14.5
*230	-226	6.43	8.2	14.5
*240	-292	6.23	8.1	14.4
*250	-331	5.70	7.8	13.9
*260	-373	4.78	7.4	13.2
270	-176	3.30	6.8	12.2
*280	-60	1.55	6.2	11.1
*290	119	-0.01	11.2	20.3
*300	226	-1.10	14.5	25.7
*310	310	-1.57	16.7	29.1
315	331	-1.19	17.7	30.8
*320	329	-0.30	18.5	32.2
*330	288	1.65	19.4	33.5
*340	161	3.63	16.2	28.1
*350	154	5.59	17.9	30.5
AVERAGE	195	13.42		49.5

* - Not included in average

TABLE II

PROPOSED STATION - INTERFERENCE CONTOURS

NEW 35° 04′ 02" - 118° 23′ 03"
Mojave, CA
Santa Monica Community College District
Channel 201B, 88.1 MHz
ERP = 22 kW (13.42 dBk)
Antenna Heights: 1,562 Meters AMSL
195 Meters HAAT
26 Meters AGL

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	ERP (dBk)	DISTANCE TO F(50,10) INTERFERENCE CONTOURS 40 DBU (km)	48 DBU (km)	54 DBU (km)	80 DBU (km)
0	213	7.55	101.4	75.7	58.3	13.1
*10	236	9.53	111.5	84.4	66.3	15.8
*20	243	11.50	121.2	91.3	72.8	18.5
*30	241	12.93	128.1	95.7	76.9	20.1
*40	228	13.42	129.0	95.9	77.0	20.2
45	150	13.42	119.1	86.1	66.9	15.6
*50	61	13.42	103.6	69.9	49.3	9.9
*60	145	13.42	118.3	85.4	66.1	15.2
*70	344	13.42	142.1	108.5	88.4	24.7
*80	284	13.42	135.1	101.6	82.5	22.5
90	395	13.42	148.8	115.5	93.4	26.6
*100	456	13.42	155.8	122.4	99.8	28.8
*110	498	12.91	157.4	125.0	102.2	29.2
*120	492	11.41	150.3	118.4	96.5	26.6
*130	488	9.42	141.5	110.3	89.6	23.6
135	484	8.41	137.1	106.2	86.1	22.1
*140	474	7.42	132.2	101.7	82.2	20.6
*145	472	6.42	128.1	98.1	79.0	19.3
*150	470	5.42	123.9	94.6	75.7	18.0
*155	437	4.42	116.3	88.2	70.0	16.0
*160	404	4.42	112.6	85.1	67.3	15.1

TABLE II

PROPOSED STATION - INTERFERENCE CONTOURS

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	ERP (dBk)	DISTANCE TO F(50,10) INTERFERENCE CONTOURS 40 DBU (km)	48 DBU (km)	54 DBU (km)	80 DBU (km)
*165	356	4.42	106.6	80.5	63.5	14.1
*170	308	4.42	100.8	75.8	59.1	13.2
*175	286	4.59	99.1	74.2	57.6	12.8
180	263	4.95	98.0	73.1	56.5	12.5
*190	184	5.99	92.6	67.5	51.0	11.2
*200	94	6.43	80.7	54.8	39.2	8.1
*210	-3	6.43	61.2	31.5	21.6	4.5
*220	-23	6.43	61.2	31.5	21.6	4.5
225	-99	6.43	61.2	31.5	21.6	4.5
*230	-226	6.43	61.2	31.5	21.6	4.5
*240	-292	6.23	60.2	31.0	21.4	4.5
*250	-331	5.70	57.6	29.9	20.7	4.4
*260	-373	4.78	53.3	28.1	19.5	4.1
270	-176	3.30	46.6	25.7	17.7	3.8
*280	-60	1.55	40.3	23.2	15.7	3.4
*290	119	-0.01	63.5	42.7	29.9	6.4
*300	226	-1.10	75.2	53.0	38.8	8.2
*310	310	-1.57	82.0	59.3	44.1	9.3
315	331	-1.19	85.2	62.2	46.6	9.9
*320	329	-0.30	87.8	64.5	48.7	10.4
*330	288	1.65	89.9	66.0	50.4	10.9
*340	161	3.63	81.8	57.6	42.5	9.1
*350	154	5.59	87.3	62.1	46.2	10.0
AVERAGE	195	13.42				

* - Not included in average

TABLE III-A

CO-CHANNEL STATION - KLON

KLON - LICENSE 33° 48′ 00" - 118° 09′ 45"
Long Beach, CA
California State University
FCC File No. BLED-910211KC
Channel 201B1, 88.1 MHz
ERP = 8.0 kW (9.03 dBk)
Antenna Heights: 143 Meters AMSL
129 Meters HAAT
34 Meters AGL

Distance to Oak Creek Pass site = 142.0 km @ 351.9°

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	DISTANCE TO CONTOURS F(50,50) 60 DBU (km)	F(50,10) 40 DBU (km)
0	121	33.0	94.6
45	127	33.7	94.6
90	134	34.6	96.6
135	140	35.3	97.5
180	130	34.1	96.0
225	136	34.8	96.9
270	131	34.2	96.1
315	117	32.6	94.0
AVERAGE	129	34.0	
351.9	120	32.9	94.5

PROPOSED 201B 60 dBu =	39.2 km*	PROPOSED 201B 40 dBu =	100.2 km*
EXISTING KLON 40 dBu =	94.5 km	EXISTING KLON 60 dBu =	32.9 km
	133.7 km		133.1 km
SEPARATION DISTANCE:	142.0 km		142.0 km
SAFETY-ZONE:	8.3 km		8.9 km

*Based upon an ERP of 4.48 dBk & HAT of 300 meters @ 171.7° toward KLON in Long Beach.

TABLE III-B

CO-CHANNEL STATION - KLON

KLON - APPLICATION 33° 48′ 00" - 118° 09′ 45"
Long Beach, CA
California State University
FCC File No. BPED-940713IZ
Channel 201B, 88.1 MHz
ERP = 30.0 kW (14.77 dBk) DA
Antenna Heights: 143 Meters AMSL
129 Meters HAAT
34 Meters AGL

Distance to Oak Creek Pass site = 142.0 km @ 351.9°

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	ERP (kW)	DISTANCE TO CONTOURS F(50,50) 60 DBU (km)	F(50,10) 40 DBU (km)
0	121	30.0	43.7	128.8
10*	119	30.0	43.4	121.5
20*	121	25.1	42.2	117.4
30*	125	17.8	39.9	110.1
40*	130	12.6	37.7	103.9
45	127	10.6	36.0	100.3
90	134	8.9	35.4	98.4
135	140	28.2	46.2	123.4
180	130	30.0	44.9	123.3
225	136	30.0	45.7	124.2
270	131	30.0	45.0	123.4
315	117	30.0	43.1	121.1
320*	111	30.0	42.3	120.1
330*	115	30.0	42.9	120.8
340*	118	30.0	43.3	121.3
350*	113	30.0	42.6	120.5
AVERAGE	129			

PROPOSED 201B 60 dBu =	39.2 km**	PROPOSED 201B 40 dBu =	100.2 km**
PROPOSED KLON 40 dBu =	121.5 km	PROPOSED KLON 60 dBu =	43.5 km
	160.7 km		143.7 km
SEPARATION DISTANCE:	142.0 km	SEPARATION DISTANCE:	142.0 km
CONTOUR OVERLAP:	-18.7 km	SAFETY-ZONE:	1.7 km

* Radial not included in average.
** Based upon an ERP of 4.48 dBk & HAT of 300 meters @ 171.7° toward KLON.

TABLE III-C

CO-CHANNEL STATION - KLON

KLON - NO OVERLAP SITUATION 33° 48′ 00" - 118° 09′ 45"
Long Beach, CA
California State University
FCC File No. BPED-940713IZ
Channel 201B, 88.1 MHz
ERP = 30.0 kW (14.77 dBk) DA
Antenna Heights: 143 Meters AMSL
129 Meters HAAT
34 Meters AGL

Distance to Oak Creek Pass site = 142.0 km @ 351.9°

RADIAL (°)	ANTENNA HEIGHT ABOVE AVERAGE TERRAIN (Meters)	ERP (kW)	DISTANCE TO CONTOURS F(50,50) 60 DBU (km)	F(50,10) 40 DBU (km)
0	**121**	**8.5**	**33.5**	**95.6**
10*	**119**	**9.2**	**33.9**	**97.2**
20*	**121**	**14.5**	**37.8**	**105.2**
30*	125	17.8	39.9	110.1
40*	130	12.6	37.7	103.9
45	127	10.6	36.0	100.3
90	134	8.9	35.4	98.4
135	140	28.2	46.2	123.4
180	130	30.0	44.9	123.3
225	136	30.0	45.7	124.2
270	131	30.0	45.0	123.4
315	117	30.0	43.1	121.1
320*	111	30.0	42.3	120.1
330*	115	30.0	42.9	120.8
340*	**118**	**18.9**	**39.5**	**110.3**
350*	**113**	**11.9**	**35.2**	**100.2**
AVERAGE	129			

PROPOSED 201B 60 dBu =	39.2 km**	PROPOSED 201B 40 dBu =	100.2 km**
PROPOSED KLON 40 dBu =	100.2 km	PROPOSED KLON 60 dBu =	35.2 km
	139.4 km		135.4 km
SEPARATION DISTANCE:	142.0 km	SEPARATION DISTANCE:	142.0 km
SAFETY-ZONE:	2.6 km	SAFETY-ZONE:	6.6 km

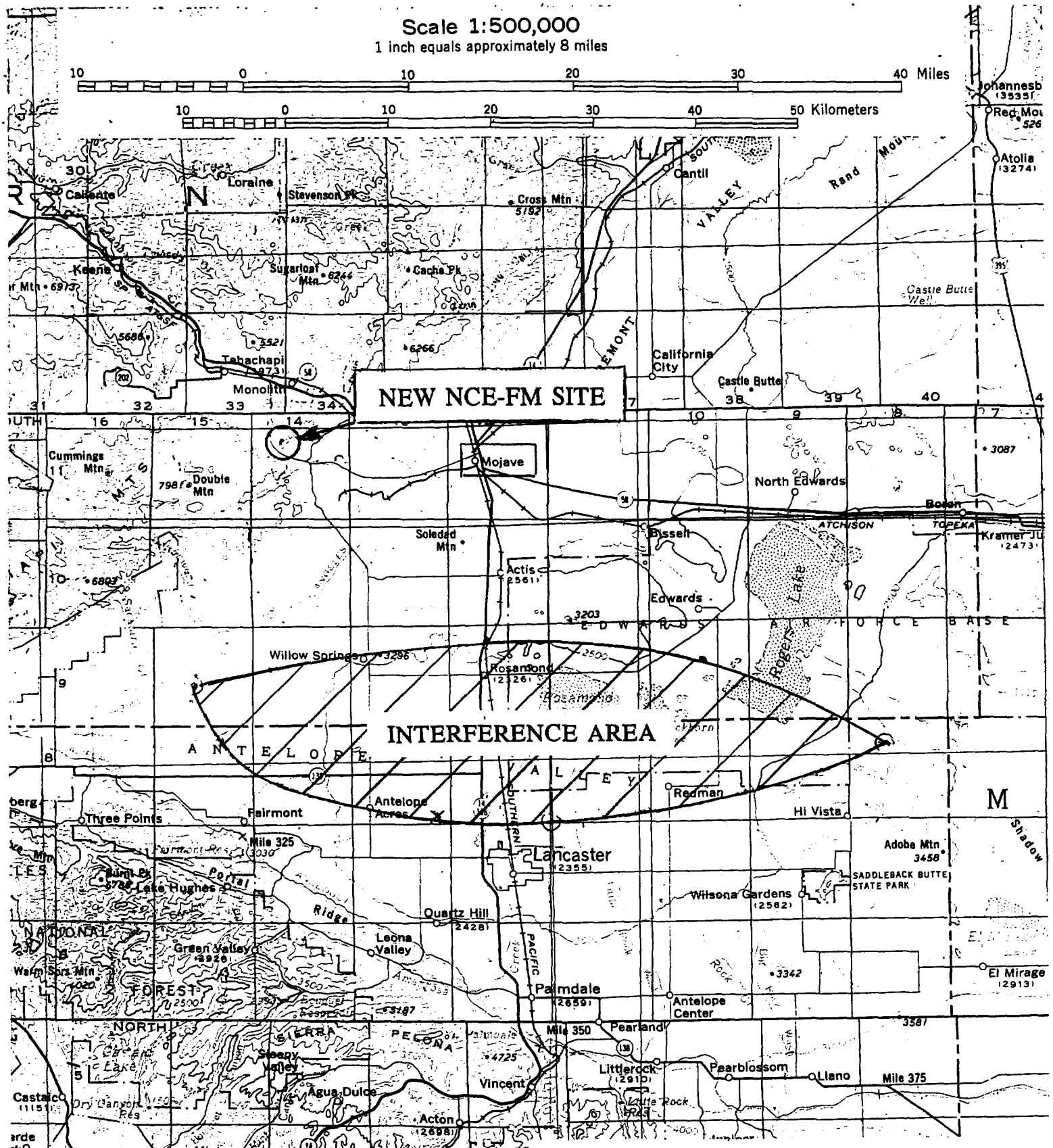


FIGURE 1

AREA OF INTERFERENCE TO PROPOSED NEW NCE-FM STATION, CHANNEL 201B MOJAVE, CA